

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SAMSUNG ELECTRONICS AMERICA,
INC.,**

Plaintiff,

V.

**YANG KUN “MICHAEL” CHUNG,
THOMAS PORCARELLO, YOON-
CHUL “ALEX” JANG, JIN-YOUNG
SONG, ALL PRO DISTRIBUTING,
INC.,**

Defendants.

CIVIL ACTION NO. 3:15-cv-04108-D

**ANSWER OF DEFENDANT YANG KUN
“MICHAEL” CHUNG TO MOTION FOR
SANCTIONS FOR SPOILIATION OF
EVIDENCE**

Defendant YANG KUN “MICHAEL” CHUNG (“Chung”) files this Answer opposing the Motion for Sanctions for Spoliation of Evidence file by Plaintiff Samsung Electronics America, Inc. on March 1, 2019.

FACTUAL BACKGROUND

1. Chung states that as a pro-se litigant, he has not it has taken him additional time to become familiar with his legal defenses, and is only now aware of his legal defenses by Google search.

2. Chung testified that he kept yearly diaries in “small books” from 2011 to 2015 and that he relied upon those diaries in preparing his First Amended Answer prepared in Korea and filed in Sep. 29, 2017.

3. Chung has never reviewed yearly diaries again since he filed the First Amended Answer in Sep. 29, 2017 and has spent all of his time to make money for his family.

4. Chung had thought that his diaries had been in his traveling bag after his return from Korea, however, he has found he doesn't have diaries.

WHEREFORE, Chung prays that Court deny Motion for Sanctions for Spoliation of Evidence file by Plaintiff Samsung Electronics America, Inc.

Respectfully submitted,

/s/ Yang Kun "Michael" Chung

Yang Kun "Michael" Chung
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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2019, I electronically filed the foregoing paper(s) with the Clerk of the Court using the ECF system which will send notification to all parties of record.

/s/ Yang Kun "Michael" Chung

Yang Kun "Michael" Chung

